

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

In re:

Dawn Martin

Debtor.

Case No. 15-11383-RGM  
Chapter 7

## JOINT MOTION FOR ORDER PERMITTING WITHDRAWAL AS COUNSEL

COME NOW The Stewart Law Firm, PLLC (“Counsel”) and Dawn Martin (“Debtor”) and move the Court for entry of an Order permitting Dawn C. Stewart, Esq. and The Stewart Law Firm, PLLC to withdraw as counsel to Debtor in this bankruptcy case, and in support thereof respectfully state as follows:

1. On October 16, 2014, the Debtor filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code in the United States Bankruptcy Court for the Western District of Wisconsin, Madison Division. On April 22, 2015 the case was transferred to the United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division.

2. On or around September 28, 2015, Debtor retained the undersigned to represent Debtor with regard to the then upcoming creditors meeting, and to assist Debtor in obtaining dismissal of the Chapter 7.

3. Throughout the representation there have been differences of opinion between counsel and Debtor as to how to proceed with the case.

4. The Debtor consents to the withdrawal of counsel and, as of this date, has terminated counsel's authority to act on behalf of the Debtor thereby effectively discharging

Dawn C. Stewart, Esq. and The Stewart Law Firm, PLLC. Said discharge requires counsel to withdraw pursuant to Rule 1.16 (a) (3) of the Virginia Rules of Professional Conduct.

5. As evidenced by Debtor's signature below, Debtor joins counsel in this request to permit counsel to withdraw from representation.

WHEREFORE, The Stewart Law Firm, PLLC and the Debtor pray for an order permitting Dawn C. Stewart, Esq. and The Stewart Law Firm, PLLC to withdraw as counsel to the Debtor in this case.

RESEPECTFULLY SUBMITTED:

Date: October 21, 2015

/s/ Dawn C. Stewart  
Dawn C. Stewart (VSB No. 27717)  
THE STEWART LAW FIRM, PLLC  
1050 Connecticut Ave., NW  
Fifth Floor  
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202-772-1080 (phone)  
202-521-0616 (fax)  
COUNSEL FOR DEBTOR

/s/ Dawn V. Martin  
Dawn V. Martin  
131 S. Franklin Street  
Madison, WI 53703  
DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served via ECF on the trustee, the U.S. Trustee, and all creditors requesting electronic notice on October 21, 2015.

Date: October 21, 2015

/s/ Dawn C. Stewart